



**CALIFORNIA  
GRAPE & TREE FRUIT  
LEAGUE**

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**Via Email:** [fkammerer@oehha.ca.gov](mailto:fkammerer@oehha.ca.gov)

Fran Kammerer  
Staff Counsel  
Office of Environmental Health Hazard Assessment  
1001 I Street, 23<sup>rd</sup> Floor  
Sacramento, CA 95812

Dear Ms. Kammerer:

On behalf of the California Grape & Tree Fruit League, a voluntary public-policy organization representing California's fresh grape and deciduous tree fruit communities, I appreciate the opportunity to provide comment on the effort to establish regulatory concepts for human and plant nutrients found in human food. It is imperative that any process that sets nutrient exposure levels avoids the unintended consequence of creating an additional pathway for establishing deterrents for consumers of nutrient-dense, beneficial plant-based foods.

We believe additional information is needed in order to understand how this process would establish quantitative exposure levels for a substance if the proposed process for assessing beneficial nutrient exposure levels is not firmly based on risk-assessment data. Also, an assessment on how the current proposal would affect those substances listed under Proposition 65 would greatly aid our understanding of the need for this proposal.

Again, warnings can be alarming to consumers and we strongly believe there must be a clear basis for triggering alarm so to avoid deterring consumption of beneficial plant-based foods. We are open to working with OEHHA to discuss concerns regarding creating confusion for consumers of highly nutritious plant-based foods.

Again, thank you for the opportunity and for your consideration. I look forward to your response.

Regards,

A handwritten signature in black ink, reading "Christopher Valadez".

Christopher Valadez  
Director, Environmental  
& Regulatory Affairs